

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

**CSX TRANSPORTATION, INC.,
individually and on behalf of
NORFOLK AND PORTSMOUTH BELT LINE
RAILROAD COMPANY,**

Plaintiff,

v.

Civil Action No. 2:18-cv-530-MSD-LRL

NORFOLK SOUTHERN RAILWAY COMPANY, *et al.*,

Defendants.

NOTICE OF MOTION TO SEAL

PLEASE TAKE NOTICE THAT Defendant Norfolk and Portsmouth Belt Line Railroad Company, by counsel, pursuant to Local Civil Rule 5 and the Stipulated Protective Order entered on October 29, 2019 (D.E. 79), is moving this Court for leave to file under seal Exhibit A to the memorandum in support of the Belt Line's motion for partial summary judgment on damages, as well as references to the exhibit in body of the memorandum in support. Exhibit A is a copy of plaintiff CSX Transportation Inc.'s Rule 26(a)(1) disclosures.

This serves as public notice that the Belt Line is moving to file the above documents under seal. The Belt Line's grounds for seeking leave to file the above documents under seal are set forth in its Motion to Seal and Memorandum in Support.

Dated: January 2, 2020

**NORFOLK AND PORTSMOUTH
BELT LINE RAILROAD COMPANY**

By: _____ */s/ James L. Chapman, IV* _____

James L. Chapman, IV, VSB No. 21983
W. Ryan Snow, VSB No. 47423
Darius K. Davenport, VSB No. 74064
David C. Hartnett, VSB No. 80452
CRENSHAW, WARE & MARTIN, P.L.C.
150 W. Main Street, Suite 1500
Norfolk, Virginia 23510
Telephone: (757) 623-3000
Facsimile: (757) 623-5735
jchapman@cwm-law.com
wrsnow@cwm-law.com
ddavenport@cwm-law.com
dhartnett@cwm-law.com
*Attorney for Norfolk and Portsmouth Belt
Line Railroad Company*

CERTIFICATE OF SERVICE

I certify that on this 2nd day of January 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a “Notice of Electronic Filing” to all counsel of record who have consented to electronic service.

By: /s/ James L. Chapman, IV
James L. Chapman, IV, VSB No. 21983
CRENSHAW, WARE & MARTIN, P.L.C.
150 W. Main Street, Suite 1500
Norfolk, Virginia 23510
Telephone: (757) 623-3000
Facsimile: (757) 623-5735
jchapman@cwm-law.com
*Attorney for Norfolk and Portsmouth Belt
Line Railroad Company*